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Attorneys for Plaintiff
MISS WORLD LIMITED

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

MISS WORLD LIMITED, a foreign company, Plaintiff, v. PHOENIX PYRE PRODUCTIONS, a general proprietorship, and EFFIE HORNING, an individual, Defendants.	Civil No. 08 CV-0712 LAB (NLS) **ORIGINAL ANSWER TO COUNTERCLAIM**

COMES NOW Miss World Limited ("Miss World") and files this Original Answer to the Counterclaim (the "Counterclaim") filed by Effie Horning ("Defendant").

ANSWER

1. On information and belief, Miss World admits the allegations in Paragraph 1 of the Counterclaim.

2. Miss World admits and alleges that it is a foreign company organized under the laws of Jersey, Channel Islands.

3. Miss World admits that the Court has personal and subject matter jurisdiction in this case.

4. Miss World admits that venue is proper in this Court.

5. Miss World is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the Counterclaim, and on that basis denies the allegations.

6. Miss World admits that, according to public records, Defendant filed the applications for the goods and services cited in Paragraph 6 of the Counterclaim.

7. Miss World denies that MISS CYBERWORLD is a currently registered mark. Miss World has filed suit to cancel the MS. LATINA USA WORLD mark, collect damages, and enjoin use of the mark and related marks. Miss World admits that public records indicate that the other marks cited in Paragraph 7 of the Counterclaim appear to be currently registered. Miss World denies the remaining allegations in Paragraph 7 of the Counterclaim.

8. Miss World admits that the Ninth Circuit decided the case cited in Paragraph 8 of the Counterclaim. Miss World denies Defendant's characterization of the case, and Miss World denies the remaining allegations in Paragraph 8 of the Counterclaim.

9. Miss World denies the allegations in Paragraph 9 of the Counterclaim.

10. Miss World admits the allegations in Paragraph 10 of the Counterclaim.

11. Miss World incorporates by reference all of the responses set forth above.

12. Miss World admits that there is a dispute between Miss World and Defendant. Miss World denies that declaratory judgment is proper procedurally or

substantively in this case, and Miss World denies the remaining allegations in Paragraph 12 of the Counterclaim.

13. Miss World denies that Defendant is entitled to any of the relief requested in the section of the Counterclaim titled "Prayer for Relief."

14. To the extent that an averment is not specifically admitted above, all such averments are hereby denied.

PRAYER FOR RELIEF

WHEREFORE, Miss World prays that the Counterclaim be denied in its entirety, that Defendant take nothing, that Miss World recover all allowed costs and fees, and that Miss World have all other and further relief to which it is entitled at law or in equity.

Dated: June 5, 2008

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ Sarah Silbert

Sarah Silbert (SBN 198594)
Richard J. Groos (TX Bar No. 08529100)
pro hac vice motion to be filed
C. Ashley Callahan (TX Bar No. 24027545)
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Attorneys for Plaintiff
MISS WORLD LIMITED

PROOF OF SERVICE BY MAIL

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 555 South Flower Street, Forty-First Floor, Los Angeles, California 90071. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On June 5, 2008, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

ORIGINAL ANSWER TO COUNTERCLAIM

in a sealed envelope, postage fully paid, addressed as follows:

Christopher W. Arledge
TURNER GREEN AFRASIABI & ARLEDGE LLP
535 Anton Boulevard, Suite 850
Costa Mesa, California 92626
Attorneys for Defendants
Phoenix Pyre Productions & Effie Horning

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on June 5, 2008, at Los Angeles, California.

Sue Crippen
Sue Crippen